

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NORTHEASTERN DIVISION**

UNITED STATES OF AMERICA

v.

GEORGIANNA A.M. GIAMPIETRO

No. 2:19-00013

**Chief Judge Waverly D. Crenshaw, Jr.
Magistrate Judge Alistair E. Newbern**

**DEFENDANT’S ADDITIONAL PROPOSED JURY QUESTIONS FOR INCLUSION IN
THE JURY QUESTIONNAIRE**

Ms. Giampietro, by and through her attorney, hereby submits these additional questions, which she believes should be included in the Confidential Jury Questionnaire that will be sent to potential jurors in this case, but to which the government objects:

BIAS AND PREJUDICE

1. Based on your experiences and personal knowledge of Muslims do you believe Muslims are less trustworthy than other people? ____ YES; ____ NO

If yes, please explain:

2. Based on your experiences and personal knowledge of Muslims do you believe Muslims are more violent than other people? ____ YES; ____ NO

If yes, please explain:

3. Do you believe that our government allows too many Muslims, or too many people from Muslim countries, to immigrate legally to the United States?

____ YES; ____ NO

LEGAL PRINCIPLES

4. The United States has the burden of proving the defendant’s guilt beyond a reasonable doubt. This burden never shifts to the defendant. The defendant is presumed innocent and

cannot be found guilty unless the jury, unanimously and based solely on the evidence in this case, decides that her guilt has been proven beyond a reasonable doubt.

- a. Will you have any difficulty following this rule of law?

_____ YES; _____ NO

- b. If no, please explain:

5. Under the law, the facts are for the jury to determine and the law is for the judge to determine. At the conclusion of the case, the judge will instruct you on the law. You are required to accept the law as the judge explains it to you, even if you do not like the law or disagree with it, and you must determine the facts according to those instructions. Will you have difficulty in accepting and applying this rule of law?

- a. _____ YES; _____ NO

- b. If no, please explain:

6. The government has the burden of proof to prove these allegations beyond all reasonable doubt. Do you think their burden should be lessened in a case involving allegations of support of terrorism organizations?

- a. _____ YES; _____ NO

- b. If yes, please explain:

CONCLUSION

Ms. Giampietro respectfully requests that the Court include the above questions in the Confidential Juror Questionnaire sent to potential jurors in this case.

Respectfully submitted this 11th day of June, 2021.

By: /s/ Charles Swift
Charles D. Swift,
Pro Hac Vice Attorney for Giampietro
CLCMA

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CERTIFICATE OF SERVICE

I hereby certify that on June 11, 2021, a true and correct copy of the foregoing document was filed electronically via CM/ECF, which will automatically provide service to all counsel of record for the government.

By: /s/ Charles Swift
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